

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Competitive Product Prices  
Global Expedited Package Services 3 (MC2010-28)  
Negotiated Service Agreement

Docket No. CP2016-13

PUBLIC REPRESENTATIVE COMMENTS ON  
POSTAL SERVICE NOTICE CONCERNING MODIFICATION TO  
GLOBAL EXPEDITED PACKAGE SERVICES 3  
NEGOTIATED SERVICE AGREEMENT

(April 22, 2016)

I. INTRODUCTION

The Public Representative hereby provides comments pursuant to Order No. 3241.<sup>1</sup> In that Order, the Commission reopens the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of filing a modification to Global Expedited Package Services 3 (GEPS 3) Negotiated Service Agreement (Agreement).<sup>2</sup>

The Commission approved the original GEPS 3 contract in Order No. 2801, dated November 4, 2015.<sup>3</sup> On April 14, 2016, the Postal Service filed the Notice that it agreed to a modification to the existing GEPS 3 negotiated service agreement subject of the current docket (Modification). To support the Notice, the Postal Service filed certified statement of compliance with 39 U.S.C. § 3633(a), a redacted copy of the

---

<sup>1</sup> Notice and Order Concerning Modification to a Global Expedited Package Services 3 Negotiated Service Agreement, April 15, 2016 (Order).

<sup>2</sup> Notice of the United States Postal Service of Filing Modification to Global Expedited Package Services 3 Negotiated Service Agreement, April 14, 2016 (Notice).

<sup>3</sup> Order Approving Additional Global Expedited Package Services 3 Negotiated Service Agreement, November 4, 2015 (Order No. 2801).

Modification and redacted versions of the revised supporting financial documents. In addition, the Postal Service filed (under seal) the unredacted Modification and unredacted financial documentation.

The Modification revises 15 Articles: 1, 3, 4, 6-10, 13, 16, 18, 20, and 24. *Notice* at 3. The rates in the Modification are intended to become effective on May 1, 2016. *Id* at 1.

## II. COMMENTS

The Public Representative has reviewed the Postal Service's Notice, the original and modified GEPS 3 contract, and the supporting financial model filed under seal. Based on this review, the Public Representative is concerned that there are individual aspects of the modified contract that do not fully comply with some statutory requirements on its own. This concern is largely mitigated by the fact that the contract, in its entirety, comport to statutory requirements and continues to be functionally equivalent to the baseline agreement.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

---

Curtis Kidd  
Public Representative

901 New York Ave. NW  
Washington, DC 20268-0001  
202-789-6881  
Curtis.Kidd@prc.gov